**POLICY & PROCEDURES**

***Defining the Overall Approach toward Meeting a Requirement***

### **Accountability §164.310(d)(2)(iii)**

### **Effective Date:** <Month Day, Year>

### **Policy Number:** <If applicable> **Rev.** 0

**Policy:** We must be accountable for information systems and electronic media containing ePHI leaving our facility and moving to another location. A laptop that travels between our facility and a workforce member’s home or goes on the road with a workforce member for work purposes is an example of ePHI leaving our facility. Our Security Official must approve and track such movements. In our organization, we will assign the responsibility of tracking the movements to workforce members who are authorized to move ePHI out of our facility.

**Procedures:** All movement of our information systems and electronic media containing ePHI into and out of our office must be approved by our Security Official. Authorized personnel responsible for such movement have the responsibility to safeguard that property and must take all appropriate and reasonable actions to protect ePHI. This includes both ePHI received and created by us. Workforce members should use only our approved electronic media to store ePHI. Unless appropriately protected and authorized, ePHI must not be stored on our workforce member home computers.

**Details:** The accountability procedures include but are not limited to:

* Information systems and electronic media containing ePHI moving into and out of its facilities, if any, will be:
* Authorized by the Security Official
* Limited to the Security Official and management.
* Assigned to workforce members who will be responsible for such movement and will take all reasonable actions to protect ePHI against damage, theft, and unauthorized access.
* Secured with a data encryption security mechanism.
* Workforce members acknowledge their responsibility to safeguard such property by signing a computer use agreement or employee confidentiality agreement.
* Documentation (e.g. computer use agreement or employee confidentiality agreement) of the practices in place will be retained as evidence of compliance.

**Location of supporting documentation:** If so, identify the document and location it is stored here.

## REVISION HISTORY

| Revision | Date | Initiator | Nature of Change |
| --- | --- | --- | --- |
| 0 |  |  | Initial draft |
| 1 |  |  |  |